

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN BERNARDINO
RANCHO CUCAMONGA DISTRICT

THE PEOPLE OF THE STATE OF CALIFORNIA,)	COURT CASE NO
)	
Plaintiff)	
)	
vs.)	
)	
Nieshia Lanee Johnson)	FELONY COMPLAINT
)	
)	
Defendant)	DA CASE NO 2011-00-0019444

The undersigned is informed and believes that:

COUNT 1

On or about November 13, 2010, in the above named judicial district, the crime of MURDER OF HUMAN FETUS, in violation of PENAL CODE SECTION 187(a), a felony, was committed by Nieshia Lanee Johnson, who did unlawfully, and with malice aforethought murder a human fetus.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c) and a violent felony within the meaning of Penal Code section 667.5(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

COUNT 2

On or about November 13, 2010, in the above named judicial district, the crime of ASSAULT BY MEANS LIKELY TO PRODUCE GREAT BODILY INJURY, in violation of PENAL CODE SECTION 245(a)(1), a felony, was committed by Nieshia Lanee Johnson, who did willfully and unlawfully commit an assault on Tieshia Lewis by means of force likely to produce great bodily injury.

"NOTICE: The above offense is a serious felony within the meaning of Penal Code section 1192.7(c)."

"NOTICE: Conviction of this offense will require you to provide specimens and samples pursuant to Penal Code section 296. Willful refusal to provide the specimens and samples is a crime."

It is further alleged pursuant to Penal Code section 12022.9(a) as to count(s) 2 that in the commission and attempted commission of the above offense, the said defendant(s) Nieshia Lane Johnson, with intent to inflict injury, and without consent, personally inflicted injury upon Tieshia Lewis which defendant knew or should have known was pregnant and said injury resulted in the termination of said pregnancy.

It is further alleged as to count 2 that in the commission of the above offense the said defendant Nieshia Lane Johnson, personally inflicted great bodily injury upon Tieshia Lewis, not an accomplice to the above offense, within the meaning of Penal Code Section 12022.7(a) and also causing the above offense to become a serious felony within the meaning of Penal Code Section 1192.7(c)(8).

* * * * *

NOTICE TO DEFENDANT AND DEFENDANT'S ATTORNEY

Pursuant to Penal Code Sections 1054.5(b), the People are hereby informally requesting that defense counsel provide discovery to the People as required by Penal Code Section 1054.3.

NOTICE TO ATTORNEY

The materials accompanying this notice may include information about witnesses. If so, these materials are disclosed to you pursuant to Penal Code section 1054.2 which provides: "No attorney may disclose or permit to be disclosed to a defendant the address or telephone number of a victim or witness whose name is disclosed to the attorney pursuant to subdivision (a) of Section 1054.1 unless specifically permitted to do so by the court after a hearing and a showing of good cause."

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT AND THAT THIS COMPLAINT CONSISTS OF 2 COUNT(S).

Executed at Rancho Cucamonga, California, on April 22, 2011.

F. Ramos

F. Ramos

DECLARANT AND COMPLAINANT

Agency: Ontario Police Department

Prelim Est. 00:00

Defendant

Nieshia Lane Johnson

Birth Date

05/17/1983

Booking No.

CII No.

NCIC